

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

MARGARET P. BYERS AND MICHAEL C.
BYERS, CO-ADMINISTRATORS OF THE
ESTATE OF CHARLES M. BYERS,
DECEASED,

Plaintiff,

v.

Case No. 3:23-cv-00801-RCY

CITY OF RICHMOND, CHIPPENHAM &
JOHNSTON-WILLIS HOSPITALS, INC.,
STEVEN M. GIBSON, DAVID R. HYDE,
JR., AND JOHN/JANE DOE SECURITY
GUARDS (1 - 5),

Defendant.

**BRIEF IN SUPPORT OF JOINT MOTION TO FILE VIDEO EXHIBIT OF REDACTED
CHESTERFIELD COUNTY POLICE DEPARTMENT BODY-WORN CAMERA
FOOTAGE**

COME NOW Plaintiffs Margaret P. Byers and Micheal C. Byers, Co-Administrators of the Estate of Charles M. Byers, deceased (“Plaintiffs”) and the City of Richmond, Chippenham & Johnston-Willis Hospitals, Inc., Steven M. Gibson, and David R. Hyde, Jr., R.N. (“Defendants”) (collectively, “Parties”), by counsel, and state as follows in support of their Joint Motion to File Video Exhibit of Redacted Chesterfield County Police Department Body-Worn Camera Footage:

Contemporaneously with this Motion and Brief, the Parties file a Joint Motion to Modify the Amended Protective Order for Records. Parties attach as an exhibit the redacted version of the Chesterfield County Police Department body-worn camera footage, asking the Court to permit them to use the unredacted version for the purposes of this litigation.

The body-worn camera footage is pertinent to the Joint Motion to Modify the Amended Protective Order, but cannot be filed through the Court's electronic system. The flash drive is being mailed on the same date the pleadings are filed.

For these reasons, the Parties respectfully request that the Court grant them leave to file this video exhibit on a flash drive.

**CHIPPENHAM & JOHNSTON-
WILLIS HOSPITALS, INC. AND
DAVID R. HYDE, JR.**

By Counsel

/s/

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and David R. Hyde, Jr.*

C E R T I F I C A T E

I hereby certify that on the 24th day of June, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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and I hereby certify that I have emailed the document to the above.

/s/ _____
Elizabeth O. Papoulakos